



**DEPARTMENT OF ENVIRONMENT AND CONSERVATION  
DIVISION OF WATER RESOURCES**

Memphis Environmental Field Office

8383 Wolf Lake Drive

Bartlett, TN 38133

Phone 901-371-3000    Statewide 1-888-891-8332    Fax 901-3713170

June 18, 2015

Doug Dowdy  
Dowdy Pork LLC  
26605 HWY 64  
Whiteville, TN 38075

CERTIFIED MAIL # 91 7108 2133 3932 2020 9753  
RETURN RECEIPT REQUESTED

Re:     Notice of Violation - Compliance Evaluation Inspection  
         Dowdy Pork CAFO  
         State Operating Permit Tracking Number: SOPCD-0017  
         Somerville, Fayette County, Tennessee

Dear Mr. Dowdy:

On June 1, 2015, personnel from the Tennessee Department of Environment and Conservation, Division of Water Resources conducted a Compliance Evaluation Inspection (CEI) at the Dowdy Pork Concentrated Animal Feeding Operation (CAFO). The purpose of the inspection was to determine compliance with the *State Operating Permit*. Your assistance and knowledge about the operation was greatly appreciated and enabled the inspection to be conducted in an efficient manner. As stated on-site, the primary focus of this inspection was to assist you in obtaining permit coverage for the CAFO. Permit coverage has not been issued because the TN Department of Agriculture (TDA) has not approved your nutrient management plan. A copy of the CEI report and associated photo document is enclosed for your reference. The following items are deficiencies that were observed during the inspection:

- A site-specific nutrient management plan has not been approved by the TN Department of Agriculture.
- Required records were not available on-site during the inspection (see the attached inspection report for additional details).

**Required Actions:**

- By August 19, 2015, submit a site-specific nutrient management plan to Dr. Sam Marshall with the TN Department of Agriculture. Dr. Marshall's mailing address is P.O. Box 40627, Nashville, TN 37204. Once approved by the TDA, a copy of the nutrient management plan should be submitted to this office.
- Keep all required documents and records current and on-site.
- By July 16, 2015, submit a written response indicating how the deficiencies noted during the inspection will be or have been resolved and how their reoccurrence will be prevented.

Also, please be aware that Catron Creek that runs adjacent to the CAFO and associated crop fields where you apply manure has been assessed as being impaired for E. Coli bacteria and phosphorus. This means that the stream has more E. Coli and phosphorus than it should. E. coli is present in waste generated from warm blooded animals and swine manure is rich in phosphorus. Therefore, it is imperative that all best management practices are employed, agronomic manure application rates are instituted and buffer zones between the manure application areas and Catron Creek/drainage ways are maintained to prevent any manure from entering Catron Creek (i.e., waters of the state).

For your convenience, enclosed is an example of record keeping templates for measureable rainfall events, daily water line inspections, weekly lagoon inspections, weekly stormwater management inspections and annual report. Please keep these records current and on site.

The Division appreciates your time and assistance during the inspection. If there are factors regarding this matter that need further discussion or if you have any questions, please contact Steve Owens at (901) 371-3029 or [steve.r.owens@tn.gov](mailto:steve.r.owens@tn.gov).

Sincerely,



Joellyn Brazile, CPESC  
Environmental Program Manager  
Division of Water Resources  
Memphis Environmental Field Office

Enclosures: Compliance Evaluation Inspection Report, Photo Document, Letter from Dr. Sam Marshall dated July 29, 2014, Rainfall Measurement Template, Daily Water Line Inspection Template, Weekly Lagoon Inspection Template, Weekly Stormwater Management Inspection Template, Annual Report Template

cc: TDEC/DWR/MEFO - file  
ec: TDEC/DWR/NCO - Enforcement and Compliance Section  
Sam Marshall - TN Department of Agriculture